

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ASIA GAINES, for herself and as next friend of her minor child, "JC,"	)	
	)	
Plaintiffs,	)	Case No. 19-cv-00775
v.	)	
	)	Judge John Z. Lee
	)	
THE CHICAGO BOARD OF EDUCATION; KRISTEN A. HAYNES; and JUANITA TYLER,	)	Magistrate Sheila M. Finnegan
	)	
Defendants.	)	<b>Jury Demand</b>
	)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule 26.2, Plaintiff hereby moves for leave to file under seal Exhibit 2 attached to her Motion for Leave to Amend. In support, Plaintiff state as follows:

1. To her Motion for Leave to Amend, Plaintiff attached Exhibits 1 and 2. Exhibit 2 contains sensitive information about investigations into the incident underlying this case, including the names of individuals involved. Defendant Board marked all of Exhibit 2 "confidential" when it produced the document in discovery in this case.

2. Plaintiff attached a completely redacted version of Exhibit 2 to her Motion to Amend. Upon filing, Plaintiff will email the Court and counsel a courtesy copy with unredacted Exhibit 2 attached.

Wherefore, Plaintiffs respectfully request 1) leave to file Exhibit 2 and 2) any other or further relief that the Court deems just.

Date: August 15, 2024

Respectfully submitted,

By: /s/ Maria Makar  
Maria Makar

Al Hofeld, Jr.  
Zach Hofeld  
LAW OFFICES OF AL HOFELD,  
JR., LLC  
30 N. LaSalle Street, #3120  
Chicago, Illinois 60602  
(773) 241-5844  
Fax - 312-372-1766  
[al@alhofeldlaw.com](mailto:al@alhofeldlaw.com)

Julia Rickert  
Maria Makar  
LOEVY & LOEVY  
311 N. Aberdeen, Third Floor  
Chicago, IL 60607  
(312) 243-5900  
[makar@loevy.com](mailto:makar@loevy.com)

*Counsel for Plaintiffs*